REMARKS

Claim Rejection under 35 USC § 112

Claims 1-18 have been rejected under 35 U.S.C. 112, first

5　paragraph, as failing to comply with the written description

requirement. More specifically, it is alleged that there is no

support given from the original disclosure for the limitation

"without the use of a broker" or "brokerless" in claims 1, 9 and

12.

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On page 5, lines 20-23, it is stated as follows:

> "The invention is designed to allow Java applications to
> talk to .Net Remoting objects without any .Net components
> running on the Java platform and will be referred to as
15　> Ja.Net (Java-.Net Communication)."

The above passage appears again on page 7, lines 3-7.

> "The first type of implementation of Ja.Net is one that
> allows Java objects to talk to .Net Remoting objects. In
20　> other words, a Java client is enabled to understand .Net
> Remoting protocols. Any supported transport protocol and
> data format supported by .Net Remoting can be used."

On page 3, lines 11-16 the following is stated:

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> "This method of bridging allows Java clients to use the
> .Net Remoting protocol to interact with a Web Service
> running in the .Net Framework. This method also allows
> .Net Framework clients to communicate with Java-based
30　> applications using the .Net Remoting protocol.

Clearly, the above passages describe a system, which does not

require an intermediary or broker. The interaction by Java

clients with a Web Service running in the .Net Framework is

35　direct and requires no broker. Similarly, the interaction

between .Net Framework clients with Java-based applications is

also direct. Accordingly, the above-mentioned passages support

the language of inter-object communication "without the use of a broker" as in claim 1 or a "brokerless" system as in claim 9.

Claim Rejection Under 35 U.S.C. § 103

5 Claims 1-3 and 5-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Thomas et al. in view of IBM Technical Disclosure Bulletin (IBM TDB), "Brokerless Object Network", No. NN960561.

10 In applying claim 1 to Thomas, it is stated that Thomas discloses a method for allowing objects in a first programming language to communicate with objects in a second programming language. To support this assertion the Examiner points to p. 1, paragraph [0011], lines 30-33 of Thomas, which says the

15 following:

> "the client (*using a first programming language*) downloads
> the requested communication proxy and dynamically
> interacts, at runtime, with an Internet service (*using a*
> *second programming language*) using the requested
> communication proxy, the communication proxy being local to
> the client"

The words in parenthesis are those of the Examiner. In Thomas,

25 the client downloads the communication proxy from the Service. The client then interacts directly with the local communication proxy it has downloaded and the latter communicates directly with the Service on behalf of the Client using any protocol that the Service may provide such as CLR, Java, COM, etc.

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In Applicant's invention, the Server sends metadata to the client who generates proxies from the metadata, which are then implemented on the client. By generating its own proxies, Applicant can optimize and verify its applications in

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development. It can also specify a protocol and a programming language.

While both Thomas and Applicant receive metadata information,

5   the metadata information of Thomas is sent by a broker to enable the client to locate the matched Internet Service communication proxy. The metadata in the present invention is received from a Java Server on a .Net Remoting client and used to generate .Net proxies. The .Net proxies are implemented on the .Net client.

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The IBM reference simply describes the operation of a Token Ring System of Communication among a number of objects. It describes how a second object of unknown location is located by a first object by passing a token around from node to node of a network

15   until the token is loaded successfully, stripped from the ring and the message responded to. This enables the two objects to communicate.

The present application is concerned primarily with a system of

20   communication between Java objects and .Net Remoting objects not just in one object locating another object so that communication can take place. Consequently, Thomas combined with IBM TDB does not render obvious any of independent claims 1, 9 or 12.

25   As stated in the previous amendment, claims 1, 9 and 12 all recite direct one-to-one mapping of .Net classes and Java classes. The mapping between classes is determined in advance, at compile time. Such mapping of classes is not discussed or suggested by Thomas, IBM TDB or Zhang. To Applicant's knowledge

30   such one-to-one mapping has not been done before.

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The one-to-one class matching of the present invention allows one to talk to a .Net Remoting object from Java without any .Net component running on the machine.

5   In paragraph 2 of page 13 of the Official Action, the Examiner in interpreting the statement in paragraph [0011], last sentence, states that it clearly indicates that in other embodiments it is advantageous for the client to actually generate the remote communications code. However, an indication

10   that the client is relieved from having to develop a remote communication code does not say that in other embodiments the client must generate such a code. In fact, Thomas, in paragraph [0003], lines 7-13, emphasizes the advantage over the prior art of the client being able to specify a protocol and a

15   language/component technology that makes the most sense for the client. In paragraph [0019] the last sentence does refer to an embodiment in which the Client 100 receives service description language information from Broker 102 and develops an application, its own communication code, to communicate with

20   Service 104. However, the latter embodiment still depends on receiving information from a broker and does not mention one-to-one mapping.

In paragraph 4 of page 14 of the Official Action, the statement

25   "the matched Internet service communication proxy," does not refer to one-to-one matching (or mapping) of classes from the second programming language to the first programming language. The foregoing statement merely refers to locating an Internet service which matches the request of the Client. Half-way down

30   paragraph [0011] the full sentence in which the foregoing words appear is as follows: "The broker matches the client request

and an Internet service, and transmits metadata to the client

enabling the client to locate the matched Internet service

communication proxy. Clearly, the word "matched" relates to the

earlier word "matches" and has been taken out of context.

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Applicant respectfully solicits re-consideration of the claims

of the present application which he submits are in condition for

allowance.

10   Respectfully submitted,

Dated: ___August 8, 2006___   By: _____

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